

# Holland & Knight

31 West 52nd Street | New York, NY 10019 | T 212.513.3200 | F 212.385.9010  
Holland & Knight LLP | [www.hklaw.com](http://www.hklaw.com)

Christine N. Walz  
(212) 513-3368  
[christine.walz@hklaw.com](mailto:christine.walz@hklaw.com)

December 10, 2019

*Via ECF*

The Honorable LaShann DeArcy Hall  
United States District Court for the Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

Re: ***In re Brendan Sullivan (Ira Kleiman et al. v. Craig Wright),***  
**Case No. 1:19-mc-02303-LDH**  
**MOTION FOR EXTENSION OF TIME**

Dear Judge DeArcy Hall:

On behalf of Brendan Sullivan, I write to seek an extension of one week to reply in support of Mr. Sullivan's Motion to Quash.

Mr. Sullivan filed on September 9, 2019, a Motion to Quash a subpoena *ad testificandum* and *duces tecum* served on him by Plaintiffs Ira Kleiman, *et al.* seeking his newsgathering materials. Plaintiffs have since requested and been granted four requests for extensions of time to respond to the Motion to Quash. Plaintiffs filed their opposition to the Motion to Quash on December 9, 2019.

Under Local Civil Rule 6.1(a), a Reply to a Motion to Quash is due two days after service of the answering papers. Mr. Sullivan's Reply is thus due December 11, 2019. Mr. Sullivan seeks a one-week extension to adequately prepare a reply, so that his reply would be due **December 18, 2019**.

Plaintiffs' counsel has consented to the requested extension. This is the first extension Mr. Sullivan has requested, and an extension will not affect any other scheduled dates in this proceeding.

Respectfully submitted,

HOLLAND & KNIGHT LLP

/s Christine N. Walz

Christine N. Walz  
31 West 52nd Street  
New York, NY 10019  
212-513-3200  
[christine.walz@hklaw.com](mailto:christine.walz@hklaw.com)  
*Counsel for Brendan J. Sullivan*

cc: Joseph M. Delich  
Velvel Freedman  
*Counsel for Plaintiffs*

Zaharah R. Markoe  
*Counsel for Defendant*